

WOMBLE BOND DICKINSON (US) LLP

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Counsel to The Huntington National Bank

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:

FIRSTOX LABORATORIES, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-42095-elm11

(Jointly Administered)

Objection Deadline: Sept. 7, 2023

**MOTION TO WAIVE LOCAL COUNSEL
REQUIREMENT UNDER LOCAL RULE 2090-4**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

The undersigned counsel for The Huntington National Bank, for their motion to waive the local counsel requirement for Todd A. Atkinson of the law firm Womble Bond Dickinson (US)

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Firstox Laboratories, LLC (0939), and Premier Medical, Inc. (4502).

LLP (“WBD”), under Rule 2090-4 of Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas (the “Local Rules”), hereby states as follows:

1. On July 20, 2023, the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors are operating their businesses as debtors in possession under sections 1107(a) and 1108 of title 11, United States Code.

2. The WBD firm has entered appearance as counsel to The Huntington National Bank (“Huntington”). The primary attorneys at WBD expected to work on this matter on behalf of Huntington are Todd A. Atkinson, James S. Livermon III, and William D. Curtis.

3. Todd A. Atkinson does not reside or maintain an office within 50 miles of the Fort Worth Division of the Northern District of Texas.

4. Mr. Atkinson does maintain an office in Houston, Texas and is a member of the bar of the State of Texas, in good standing, and admitted to practice in the United States District Courts for the Northern and Southern Districts of Texas.

5. Mr. Atkinson has practiced bankruptcy law for over 15 years and is also admitted to practice and in good standing in the United States Court of Appeals for the Fifth Circuit and Sixth Circuit, and the United States District Courts for the Northern District of Ohio, Southern District of Ohio, District of Delaware, and Southern District of New York.

6. Counsel is prepared to perform all duties of local counsel, including appearance at hearings, as well as all other duties required by the Local Rules or other procedures of the Court.

WHEREFORE, the undersigned counsel to Huntington requests that the Court grant the motion for leave and exempt Huntington and its counsel at WBD from the requirement of obtaining local counsel under Local Rule 2090-4.

Dated: August 17, 2023

WOMBLE BOND DICKINSON (US) LLP

/s/ Todd A. Atkinson

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Counsel to The Huntington National Bank

CERTIFICATE OF SERVICE

I certify that on August 17, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Todd A. Atkinson

Todd A. Atkinson